

EXHIBIT A

Approved, SCAO

Original - Court
1st Copy - Defendant2nd Copy - Plaintiff
3rd Copy - ReturnSTATE OF MICHIGAN
THIRD JUDICIAL CIRCUIT
WAYNE COUNTY

SUMMONS

CASE NO.
20-010750-NO
Hon. David J. Allen

Court address : 2 Woodward Ave., Detroit MI 48226

Court telephone no.: 313-224-0250

Plaintiff's name(s), address(es), and telephone no(s)
HAMMOUD, ZEINAB

v

Defendant's name(s), address(es), and telephone no(s).
WAL-MART STORES EAST, Limited Partnership, d/b/a
WAL-MART SUPERCENTER 2912

Plaintiff's attorney, bar no., address, and telephone no

Lambros L. Andreopoulos 45136
28900 Woodward Ave
Royal Oak, MI 48067-0942

Instructions: Check the items below that apply to you and provide any required information. Submit this form to the court clerk along with your complaint and, if necessary, a case inventory addendum (form MC 21). The summons section will be completed by the court clerk.

Domestic Relations Case

- ☐ There are no pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.
- ☐ There is one or more pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint. I have separately filed a completed confidential case inventory (form MC 21) listing those cases.
- ☐ It is unknown if there are pending or resolved cases within the jurisdiction of the family division of the circuit court involving the family or family members of the person(s) who are the subject of the complaint.

Civil Case

- ☐ This is a business case in which all or part of the action includes a business or commercial dispute under MCL 600.8035
- ☐ MDHHS and a contracted health plan may have a right to recover expenses in this case. I certify that notice and a copy of the complaint will be provided to MDHHS and (if applicable) the contracted health plan in accordance with MCL 400.106(4).
- ☐ There is no other pending or resolved civil action arising out of the same transaction or occurrence as alleged in the complaint.
- ☐ A civil action between these parties or other parties arising out of the transaction or occurrence alleged in the complaint has

been previously filed in ☐ this court, ☐ _____ Court,

where it was given case number _____ and assigned to Judge _____.

The action ☐ remains ☐ is no longer pending.

Summons section completed by court clerk.

SUMMONS

NOTICE TO THE DEFENDANT: In the name of the people of the State of Michigan you are notified:

1. You are being sued.
2. **YOU HAVE 21 DAYS** after receiving this summons and a copy of the complaint to **file a written answer with the court** and serve a copy on the other party or **take other lawful action with the court** (28 days if you were served by mail or you were served outside this state).
3. If you do not answer or take other action within the time allowed, judgment may be entered against you for the relief demanded in the complaint.
4. If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Issue date
8/20/2020Expiration date*
11/19/2020Court clerk
Laverne Chapman

Cathy M. Garrett- Wayne County Clerk.

*This summons is invalid unless served on or before its expiration date. This document must be sealed by the seal of the court.

MC 01 (9/19)

SUMMONS

MCR 1.109(D), MCR 2.102(B), MCR 2.103, MCR 2.104, MCR 2.105



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Royal Oak, MI 48067
(248) 399-9991 / (248) 399-9996

STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

ZEINAB HAMMOUD,

Plaintiff,

Case No. 20- NO

Hon.

vs.

WALMART INC., WAL-MART STORES, INC.,
and WAL-MART STORES EAST, Limited Partnership,
d/b/a WAL-MART SUPERCENTER 2912,

Defendant.

L. LOUIE ANDREOPOULOS (P45136)
DAVID T. HILL (P48771)
Attorneys for Plaintiff
Andreopoulos & Hill, PLLC
28900 Woodward Ave.
Royal Oak, MI 48067
(248) 399-9991 / (248) 399-9996 (fax)
injuryattorneys@andhilllaw.com

*There is no other pending or resolved civil action arising out of
the transaction or occurrence alleged in the Complaint.*

COMPLAINT AND DEMAND FOR JURY TRIAL

NOW COMES the Plaintiff, ZEINAB HAMMOUD, by and through her attorneys,
ANDREOPOULOS & HILL, PLLC, and complaining against the above-named
Defendants, respectfully represents to this Honorable Court, as follows:

COUNT I – GENERAL AVERMENTS

1. Plaintiff is a resident of the County of Wayne, State of Michigan.
2. Defendant, WALMART INC., is an entity regularly conducting business in the
County of Wayne and State of Michigan, and at all times relevant hereto was
regularly doing business and/or otherwise established in the County of Wayne and

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State of Michigan, its resident agent for service of process being The Corporation Company, 40600 Ann Arbor Road E., Ste. 201, Plymouth, MI 48170-4675.

3. Defendant, WAL-MART STORES, INC., is an entity regularly conducting business in the County of Wayne and State of Michigan, and at all times relevant hereto was regularly doing business and/or otherwise established in the County of Wayne and State of Michigan, its resident agent for service of process being The Corporation Company, 40600 Ann Arbor Road E., Ste. 201, Plymouth, MI 48170-4675.
4. Defendant, WAL-MART STORES EAST, Limited Partnership, d/b/a WAL-MART SUPERCENTER 2912, is an entity regularly conducting business in the County of Wayne and State of Michigan, and at all times relevant hereto was regularly doing business and/or otherwise established in the County of Wayne and State of Michigan, its resident agent for service of process being The Corporation Company, 40600 Ann Arbor Road E., Ste. 201, Plymouth, MI 48170-4675.
5. The incident complained of herein occurred on August 21, 2017, in the County of Wayne and State of Michigan, at Defendant's store located at 7555 Telegraph Road, Taylor, Michigan 48180, more commonly known as Store #2912.
6. The amount in controversy herein exceeds the sum of Twenty-Five Thousand Dollars (\$25,000).

COUNT II – GENERAL NEGLIGENCE CLAIM AS TO DEFENDANT

7. Plaintiff re-alleges and incorporates by reference all of the preceding paragraphs of this Complaint as though more fully set forth herein.
8. On the date and time aforesaid, the Plaintiff was an invitee lawfully upon the premises of the Defendant, at said location as set forth above.

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9. As a result of the negligent actions of the Defendant and/or Defendant's employees and/or agents, the Plaintiff was caused to slip and fall due to the existence of an extremely hazardous substance on the floor, the existence of which was not discoverable upon casual inspection and/or was effectively unavoidable.
10. As a result of the negligence aforesaid, the Plaintiff was caused to sustain severe and serious personal injuries, including, but not limited to: neck, head, back, legs, knees, shoulders, and aggravation of pre-existing conditions, to be determined as discovery reveals.
11. Defendants owed duties to the Plaintiff, as Defendants' invitee, and breached said duties in each of the following manners including, but not limited to, failure to adequately and properly train and/or otherwise supervise the agents and/or employees of the Defendants in the proper protocols and procedures for maintenance of areas in the presence of the public, especially when in the presence of customers/invitees, in particular, the Plaintiff herein.
12. As a direct and proximate result of the negligence of the Defendants and/or Defendants' employees and/or agents, the injured Plaintiff sustained:
 - A. Severe bodily injuries which were painful, disabling and necessitated medical care;
 - B. Medical expenses for necessary care and treatment, including past, present and future;
 - C. Shock and emotional damage;
 - D. Possible aggravation of pre-existing conditions and/or reactivation of dormant conditions;
 - E. Inability to attend to Plaintiff's usual affairs, render services as formerly and the inability to enjoy the normal pursuit of life as before;

F. Injuries which are permanent to the degree Plaintiff suffered a loss in ability to earn money as before, and will have impaired earning capacity in the future, continued pain and suffering as well as permanency, all as a result of the negligence as alleged herein;

G. Others to be determined as discovery reveals.

13. As a direct and proximate result of the negligence of Defendants and the resulting injuries to Plaintiff, the Plaintiff did and may continue to incur expenses for hospitals, doctors, x-rays, medicines and other medical supplies and attention.
14. As a direct and proximate result of the negligence of Defendants as aforesaid, the Plaintiff has been compelled to expend and become obligated for large sums of money for medical care and treatment, and in the future, may be required to expend and become obligated for sums of money for medical care, attention and supplies for treatment and aforesaid injuries sustained.
15. Plaintiff will continue to have pain and suffering as well as permanency, all as a result of Defendants' negligence, as hereinbefore alleged.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court award damages in Plaintiff's favor and against Defendants in whatever amount Plaintiff is found to be entitled, together with interest, costs, and attorney fees.

Respectfully submitted,

ANDREOPOULOS & HILL, PLLC

/s/ L. Louie Andreopoulos

L. LOUIE ANDREOPOULOS (P45136)

DAVID T. HILL (P48771)

Attorneys for Plaintiff

28900 Woodward Ave.

Royal Oak, MI 48067

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Dated: August 20, 2020

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injuryattorneys@andhilllaw.com

DEMAND FOR JURY TRIAL

NOW COMES the Plaintiff, by and through Plaintiff's attorneys, ANDREOPOULOS
& HILL, PLLC and hereby demands a trial by jury of the within cause.

Respectfully submitted,

ANDREOPOULOS & HILL, PLLC
/s/ L. Louie Andreopoulos
L. LOUIE ANDREOPOULOS (P45136)
DAVID T. HILL (P48771)
Attorneys for Plaintiff
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Dated: August 20, 2020